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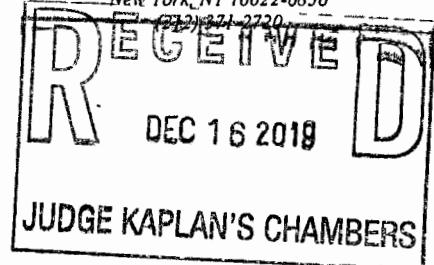
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December 13, 2019

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10005

MEMO ENDORSED

Re: United States v. Sylvia Ash, 19-cr-780 (LAK)

Dear Judge Kaplan:

We represent Ms. Sylvia Ash in the above referenced matter. We respectfully request that the Court modify Ms. Ash's bail conditions to remove her electronic GPS monitoring bracelet. The government, by Assistant United States Attorney Eli Mark, and Pretrial Services, by Joshua Rothman, do not oppose this request.

On October 11, 2019, Magistrate Judge Wang set Ms. Ash's current bail conditions. Ms. Ash was released on a bond of five hundred thousand dollars (\$500,000), secured by Ms. Ash's residence in Brooklyn, and co-signed by three financially responsible persons. Her travel was restricted to the SDNY and EDNY, and she was subjected to electronic GPS monitoring. She also surrendered her travel documents to Pretrial Services.

Ms. Ash requests that these bail conditions be modified to remove the electronic monitoring bracelet. As a precondition to that modification, Ms. Ash agrees to increase the secured bond amount to seven hundred fifty thousand dollars (\$750,000) and for the bond to be co-signed by four financially responsible persons. Neither the government nor Pretrial Services oppose this proposal.

Removal of Ms. Ash's electronic monitoring bracelet is consistent with the objectives of the Bail Reform Act, and we respectfully request that the Court grant that modification and order the removal of her electronic monitoring bracelet upon the signing of the new bond and filing of an amended confession of judgment.

Respectfully submitted,

G. Michael Bellinger
G. Michael Bellinger

Cc: AUSA Eli Mark (via ECF)
AUSA Daniel Richenthal (via ECF)

SO ORDERED
Granted on my behalf
LEWIS A. KAPLAN, USDC
12/16/19



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 16, 2019

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Sylvia Ash,*
19 Cr. 780 (LAK)



Dear Judge Kaplan:

The Government respectfully writes in the above-captioned matter in brief response to the defendant's letter motion of December 13, 2019 (Dkt. No. 21) requesting a modification of her conditions of release pending trial. As indicated in the defendant's letter, the Government does not object to the defendant's request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: (by email)

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